

PUBLIC DISCLOSURE

November 3, 2010

**MORTGAGE LENDER COMMUNITY INVESTMENT
PERFORMANCE EVALUATION**

**SUPERIOR MORTGAGE CORPORATION
MC2743**

**854 S. WHITE HORSE PARK
HAMMONTON, NJ 08037**

**DIVISION OF BANKS
1000 WASHINGTON STREET
BOSTON, MA 02118**

NOTE:	This evaluation is not, nor should it be construed as, an assessment of the financial condition of this mortgage lender. The rating assigned to this mortgage lender does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this mortgage lender.
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GENERAL INFORMATION

Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' ("Division") regulation 209 CMR 54.00, Mortgage Lender Community Investment ("MLCI"), require the Division to use its authority when examining mortgage lenders subject to its supervision who have made 50 or more home mortgage loans in the last calendar year, to assess the mortgage lender's record of helping to meet the mortgage credit needs of the Commonwealth, including low- and moderate-income neighborhoods and individuals, consistent with the safe and sound operation of the mortgage lender. Upon conclusion of such examination, the Division must prepare a written evaluation of the mortgage lender's record of meeting the credit needs of the Commonwealth.

This document is an evaluation of the MLCI performance of **Superior Mortgage Corporation ("Superior Mortgage")** prepared by the Division, the mortgage lender's supervisory agency, as of **November 3, 2010**.

SCOPE OF EXAMINATION

An evaluation was conducted using examination procedures as defined by MLCI. A review of the Division's records, as well as the mortgage lender's public MLCI file, did not reveal any complaints relating to Superior Mortgage's MLCI performance.

The MLCI examination included a comprehensive review and analysis, as applicable, of Superior Mortgage's:

- (a) origination of loans and other efforts to assist low and moderate income residents, without distinction, to be able to acquire or to remain in affordable housing at rates and terms that are reasonable considering the lender's history with similarly situated borrowers, the availability of mortgage loan products suitable for such borrowers, and consistency with safe and sound business practices;
- (b) origination of loans that show an undue concentration and a systematic pattern of lending resulting in the loss of affordable housing units;
- (c) efforts working with delinquent residential mortgage customers to facilitate a resolution of the delinquency; and
- (d) other efforts, including public notice of the scheduling of examinations and the right of interested parties to submit written comments relative to any such examination to the Commissioner, as, in the judgment of the Commissioner, reasonably bear upon the extent to which a mortgage lender is complying with the requirements of fair lending laws and helping to meet the mortgage loan credit needs of communities in the Commonwealth.

MLCI examination procedures were used to evaluate Superior Mortgage's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Superior Mortgage's lending and community development activities for the period of January 2008 through December 2009. The data and applicable timeframes for the Lending Test and the Service Test are discussed below.

The Lending Test evaluates the mortgage lender's community investment performance pursuant to the following five criteria: geographic distribution of loans, lending to borrowers of different incomes, innovative and flexible lending practices, fair lending, and loss of affordable housing.

The MLCI evaluation includes an analysis of the mortgage loans reportable under the Home Mortgage Disclosure Act ("HMDA") for 2008 and 2009. The residential loan data was obtained from the Loan Application Registers ("LAR") maintained by Superior Mortgage pursuant to HMDA.

Home mortgage lending for 2008 and 2009 is presented in the geographic distribution, lending to borrowers of different incomes and the Minority Application Flow tables. Comparative analysis of the mortgage lender's lending performance for the year of 2009 is provided because it is the most recent year for which aggregate HMDA lending data is available. The aggregate lending data is used for comparison purposes within the evaluation and is a measure of loan demand. It includes lending information from all HMDA reporting lenders which originated loans in the Commonwealth of Massachusetts.

In addition to gathering and evaluating statistical information relative to a mortgage lender's loan volume, the MLCI examination also reflects an in depth review of the entity's mortgage lending using qualitative analysis, which includes, but is not limited to: an assessment of the suitability and sustainability of the mortgage lender's loan products by reviewing the lender's internally maintained records of delinquencies and defaults as well as information publicly available through the Federal Reserve Banks and through local Registries of Deeds and through other sources available to the examination team. The examination included inspection of individual loan files for review of compliance with consumer protection provisions and scrutiny of these files for the occurrence of disparate treatment based on a prohibited basis.

The Service Test evaluates the mortgage lender's record of helping to meet the mortgage credit needs by analyzing the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products, the extent and innovativeness of its community development services, and, if applicable, loss mitigation services to modify loans and/or efforts to keep delinquent home borrowers in their homes.

MORTGAGE LENDER'S MLCI RATING:

This mortgage lender is rated "Satisfactory."

- The geographic distribution of the Lender's loans reflects an adequate dispersion in low- and moderate-income Census tracts as it is reflective of the distribution of owner occupied housing in those Census tracts.
- The distribution of loans by borrower income reflects, given the demographics of Massachusetts, an adequate record of serving the credit needs of individuals of different income levels, including low- and moderate-income.
- Superior Mortgage offers a number of flexible lending products, provided in a safe and sound manner using sound underwriting criteria, to address the credit needs of low- and moderate-income individuals.
- Fair lending policies and practices are considered reasonable.
- The lender has a minimal number of Community Development Services.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Superior Mortgage was established in 1987 and was granted a mortgage broker and lender license by the Division in October 2003. Superior Mortgage's main office is located in Hammonton, New Jersey. The lender has one branch office located in Belmont, Massachusetts and has two other licensed locations to conduct Massachusetts business in Woodbridge, New Jersey and Parsippany, New Jersey. The company also offers lending in 20 states.

Superior Mortgage offers a variety of mortgage loan products to meet the needs of the Commonwealth's borrowers. Superior Mortgage is a direct endorsed lender for the Federal Housing Administration and Veteran's Administration loan products. The branch office in Belmont, Massachusetts and the other licensed locations in New Jersey are responsible for application in-take and processing. All underwriting for Massachusetts loans is centralized at the licensed location in Parsippany, New Jersey.

Approved loans are funded through a warehouse line of credit with GMAC Bank, JP Morgan Chase, or Wachovia Bank. Superior Mortgage's business development relies primarily on referrals and repeat customers. Loans originated are closed in Superior Mortgage's name and sold immediately to investors.

Demographic Information

The MLCI regulation requires mortgage lenders to be evaluated on their performance within the Commonwealth of Massachusetts. Demographic data is provided below to offer contextual overviews of economic climate along with housing and population characteristics for the Commonwealth of Massachusetts.

DEMOGRAPHIC INFORMATION*						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A
Geographies (Census Tracts)	1,361	8.4	21.7	46.1	23.4	0.4
Population by Geography	6,349,097	5.8	20.5	47.6	26.0	0.1
Owner-Occupied Housing by Geography	1,508,248	1.6	12.8	54.0	31.6	0.0
Family Distribution by Income Level	1,587,537	20.5	17.7	22.3	39.5	0.0
Distribution of Low and Moderate Income Families throughout AA Geographies	606,419	10.0	29.4	46.2	14.4	0.0
Median Family Income		\$65,318	Median Housing Value		\$209,519	
2009 HUD Adjusted Median Family Income		\$82,684	Unemployment Rate		9.3%**	
Households Below Poverty Level		9.8%				

*Source: 2000 US Census

**as of 2/10

Based on 2000 Census data, the Commonwealth of Massachusetts has a total population of just over 6.3 million people and a total of 2.6 million housing units. Of the total housing units, 1.5 million or 57.5 percent are owner-occupied, 935,332 or 35.7 percent are rental-occupied, and 6.8 percent are vacant units.

Low-income is defined as individual income that is less than 50 percent of the area median income. Moderate-income is defined as individual income that is at least 50 percent and less than 80 percent of the area median income. Middle-income is defined as individual income that is at least 80 percent and less than 120 percent of the area median income. Upper-income is defined as individual income that is more than 120 percent of the area median income.

There are 2.4 million households in the Commonwealth with a median household income of \$53,686 according to the 2000 Census. Over 40 percent of the households are classified as low- and moderate-income. In addition, 9.8 percent of the total numbers of households are living below the poverty level. Individuals in these categories may find it challenging to qualify for traditional mortgage loan products.

Households classified as “families” total slightly over 1.5 million. Of all family households, 20.5 percent are low income, 17.7 percent are moderate income, 22.3 percent are middle income, and 39.5 percent are upper income. The median family income according to the 2000 census was \$65,318. The Housing and Urban Development (“HUD”) adjusted median family income is \$82,684. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth of Massachusetts contains 1,361 Census tracts. Of these, 114 or 8.4 percent are low-income; 295 or 21.7 percent are moderate-income; 628 or 46.1 percent are middle-income; 319 or 23.4 percent are upper-income; and 5 or 0.4 percent are NA or have no income designation. The five census tracts with no income designation are located in Bridgewater (a correctional facility), Boston (islands in Boston Harbor), Amherst (U MASS campus), Harvard (Fort Devens), and Grafton (Tufts Veterinary School). These Census tracts contain no housing units and will not be included in this evaluation since they provide no lending opportunities.

The median housing value for Massachusetts was \$209,519 according to the 2000 Census. However, recent figures from the Warren Group, publishers of the Banker and Tradesman, show the median price for a single-family increased to \$300,500 in 2008 and experienced a drop of 5.2 percent to \$284,900 in 2009. Fluctuating housing values have a direct effect on the types of financial products adequate for homeowners and property buyers.

The unemployment rate for Massachusetts dropped from 8.4 percent in September 2010 to 8.1 percent in October 2010, the lowest unemployment rate since April 2009. Employment rates would tend to affect a borrower’s ability to remain current on mortgage loan obligations and also correlates to delinquency and default rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Superior Mortgage's Lending Test performance was rated an overall "Satisfactory." Superior Mortgage's lending efforts are rated under the five performance criteria: Geographic Distribution, Borrower Characteristics, Innovative or Flexible Lending Practices, Fair Lending Policies and Procedures, and Loss of Affordable Housing. The following information details the data compiled and reviewed, as well as conclusions on the mortgage lending performance of Superior Mortgage.

I. Geographic Distribution

The geographic distribution of loans was reviewed to assess how well Superior Mortgage is addressing the credit needs throughout the Commonwealth of Massachusetts' low-, moderate-, middle-, and upper-income Census tracts.

The mortgage lender's geographic distribution of loans reflects an adequate distribution of loans in the Commonwealth.

The following table presents Superior Mortgage's HMDA reportable loans as well as the 2009 aggregate data (exclusive of Superior Mortgage). In addition, the table also reflects the percentage of owner-occupied housing units in each of the Census tract income categories.

<i>Distribution of HMDA Loans by Income Category of the Census Tract</i>								
<i>Census Tract Income Level</i>	<i>% Total Owner-Occupied Housing Units</i>	<i>Superior Mortgage 2008</i>		<i>Superior Mortgage 2009</i>		<i>Aggregate Lending Data (% of #) 2009</i>	<i>Superior Mortgage Total</i>	
<i>Low</i>	1.6	0	0.0	5	1.4	1.5	5	1.0
<i>Moderate</i>	12.8	29	18.8	43	12.3	10.6	72	14.3
<i>Middle</i>	54.0	73	47.4	193	55.1	50.7	266	52.8
<i>Upper</i>	31.6	52	33.8	109	31.1	37.1	161	31.9
<i>NA*</i>	0	0	0.0	0	0.0	0.1	0	0.0
<i>Total</i>	100.0	154	100.0	350	100.0	100.0	504	100.0

Source: 2008 and 2009 HMDA Data and 2000 U.S. Census

As reflected in the above table, from 2008 to 2009 the lender's loan volume more than doubled. There was a notable increase in the number of loans in all income Census tracts. Superior Mortgage's number of loans to low-income tracts increased in 2009 and is in line with the aggregate performance of 1.5 percent. The lending to low income census tracts is also consistent with the area's owner occupied housing units. In lending to moderate income tracts, the volume increased significantly in 2009 and Superior Mortgage exceeded the aggregate's performance and was in line with the owner occupied housing units.

The lending to middle-income geographies remained the highest concentration of loans in 2009 and exceeded the aggregate performance at 50.7 percent. Superior Mortgage's retail branch office is situated in a middle-income geography. Upper income geographies accounted for the second highest percentage of loans in 2009. With the surrounding communities of Cambridge, Arlington, Lexington, Waltham, and Watertown, which have upper income geographies, it is reasonable to find a high percentage of loans originated in upper-income Census tracts. Superior Mortgage's lending in middle- and upper-income census tracts is consistent with the area's owner occupied housing units.

Overall, the significant increase in volume and the positive trend in relation to the aggregate, Superior Mortgage's distribution of loans reflects adequate performance in the Commonwealth.

II. Borrower Characteristics

The distribution of loans by borrower income levels was reviewed to determine the extent to which the lender is addressing the credit needs of the Commonwealth's residents.

Superior Mortgage achieved an adequate record of serving the mortgage credit needs of borrowers of different income levels based on the area's demographics and a comparison to aggregate lending data in Massachusetts.

The following table shows HMDA-reportable loans to low-, moderate-, middle- and upper-income borrowers in comparison to the aggregate and the percentage of total families within the Commonwealth in each respective income group.

<i>Distribution of HMDA Loans by Borrower Income</i>								
<i>Census Tract Income Level</i>	<i>% Families</i>	<i>Superior Mortgage 2008</i>		<i>Superior Mortgage 2009</i>		<i>Aggregate Lending Data (% of #) 2009</i>	<i>Superior Mortgage Total</i>	
<i>Low</i>	20.5	2	1.3	17	4.9	5.0	19	3.8
<i>Moderate</i>	17.7	35	22.7	72	20.6	16.6	107	21.2
<i>Middle</i>	22.3	59	38.3	114	32.5	23.7	173	34.3
<i>Upper</i>	39.5	58	37.6	115	32.9	39.7	173	34.3
<i>NA*</i>	0.0	0	0.0	32	9.1	14.9	32	6.4
<i>Total</i>	100.0	154	100.0	350	100.0	100.0	504	100.0

*Source: 2008 & 2009 HMDA Data and 2000 U.S. Census *Income Not Available*

As shown in the above table, middle and upper-income borrowers accounted for the highest percentage of total loans in 2009 by Superior Mortgage. The percentage of total loans to middle-income borrowers exceeded the percentage of families in those income tracts and exceeded the aggregate performance. The majority of Superior Mortgage's business is based on referrals and repeat customers in the surrounding communities of their branch office, where home values and incomes are higher. This explains the higher volume of lending to those areas. However, this did not negatively impact the lending to low- and moderate-income borrowers. From 2008 to 2009, the number of loans to low- and moderate-income borrowers increased significantly.

Several factors that lead to an increase in lending to these borrowers was Superior Mortgage's use of FHA products, which provide financing opportunities to low- and moderate-income borrowers and existing homeowners. It is conceivable that this flexible loan product benefited all income categories of borrowers proportionately and reflects Superior Mortgage's willingness to lend to borrowers of all income categories. Another factor that led to an increase in lending to low- and moderate-income borrowers was the decline in the median housing price which dropped from \$305,000 in 2008 to \$284,900 in 2009, creating more opportunities for borrowers to qualify for home financing, specifically first time homebuyers.

Overall, the significant increase in volume and the positive trend in relation to the aggregate, Superior Mortgage's distribution of loans reflects adequate performance in the Commonwealth.

III. Innovative or Flexible Lending Practices

Superior offers a number of flexible lending products, which are provided in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Superior Mortgage is a Direct Endorsed Lender for the Federal Housing Administration (FHA). Superior Mortgage offers FHA insured mortgages. The FHA loans offer low down payments and liberal qualifying ratios. Also, FHA borrowers do not have to meet maximum income qualifications, as with many other government programs. Maximum loan amounts, however, are set by region across the country.

In 2008, Superior Mortgage's FHA loan production was 55 loans, which represented \$15,112,412 in dollar volume. In 2009, there was a significant increase in origination of FHA loans. Superior Mortgage funded a total of 165 loans with a dollar volume of \$46,441,682.

Other options available from Superior Mortgage include: Veterans Administration loans (VA), the Department of Veterans Affairs guarantees repayment of loans made to veterans with no down payment in most cases and liberal qualifying guidelines. Superior Mortgage is a Direct Lender for VA loans and in 2008 and 2009. There were a total of 3 VA loans funded with a dollar volume of \$592,848.

Superior Mortgage is a direct lender for Fannie Mae lending products. The products serve low- and moderate-income borrowers and communities with flexible terms and many options. Products include Fannie Mae's Home Affordable Refinance Program, also known as the Refi Plus. This product began being offered in 2009 for refinances of existing Fannie Mae loans, to homeowners that have loans on their homes with decreased value. The Refi Plus program offers refinances for current loan to value ratios up to 125 percent, mortgage insurance flexibilities and fifteen or thirty year loan terms. In 2009, Superior Mortgage funded a total of 19 loans with a dollar volume of \$5,022,700.

In 2010, Superior Mortgage began offering Mass Housing products such as the My Community and the MassAdvantage Program. From January 1, 2010 through October 31, 2010, Superior Mortgage funded four MassHousing loans totaling \$883,800.

IV. Fair Lending

The Division examines a mortgage lender's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-103 and Regulatory Bulletin 5.3-101. The mortgage lender's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. The review included, but was not limited to, review of written policies and procedures, interviews with mortgage lender personnel, and individual file review. No evidence of disparate treatment was identified.

Superior Mortgage has established an adequate record relative to fair lending policies and practices.

Fair lending is incorporated in Superior Mortgage's company-wide policy and is also implemented at all levels of the company from the preliminary customer inquiry to post closing.

Superior Mortgage has established quality control procedures outlined in the Lender's Quality Control Manual. The procedures are implemented company-wide. In addition, quality control procedures contain specific requirements for audits of loan products. A staff of auditors conducts reviews on all aspects of the loan process. The quality control procedures serve as an early detection warning system against non-compliance with fair lending regulations, Real Estate Settlement Procedures Act, state laws, and other applicable laws and regulations.

If any violations are discovered by the auditors, prompt action and written notification to senior management of deficiencies is required. Depending upon the level of violation discovered, disciplinary action may be required.

Superior Mortgage participates in several trainings throughout the year which include Fair Lending Training and compliance with the Home Mortgage Disclosure Act, Real Estate Settlement Procedures Act training as well as other updates on laws and regulations. Trainings are offered online, hosted by an outside vendor and, also, in-house trainings are offered. All updates to policies and procedures are made available to employees during company meetings that are held on a weekly basis.

Superior Mortgage's marketing and advertising were reviewed. Advertisement materials were considered adequate.

MINORITY APPLICATION FLOW

Demographic information for Massachusetts reveals that the total ethnic and racial minority population stood at 18.12 percent of the total population in 2008. This segment of the population is comprised of 6.75 percent Hispanic or Latino and 11.38 racial minority: 5.01 percent Black; 3.73 percent Asian; .18 percent American Indian; .03 percent Native Hawaiian/Other Pacific Islander; and 2.42 percent identified as Other Race.

For 2008 and 2009, Superior Mortgage received a total of 566 HMDA-reportable loan applications from within the Commonwealth of Massachusetts. Of these applications, 16 or 2.8 percent were received from minority applicants, of which 15 or 93.7 percent resulted in originations. Superior Mortgage received 5 or 0.9 percent of HMDA reportable applications from ethnic groups of Hispanic origin within its assessment area of which 4 or 80.0 percent were originated.

Refer to the following table for information on the mortgage lender's minority application flow as well as a comparison to aggregate lenders throughout the Commonwealth of Massachusetts. The comparison of this data assists in deriving reasonable expectations for the rate of applications the mortgage lender received from minority applicants.

Superior Mortgage's minority application data indicates that lending to both racial and ethnic minorities is substantially below the aggregate.

MINORITY APPLICATION FLOW								
RACE	Superior Mortgage 2008		Superior Mortgage 2009		2009 Aggregate Data		Superior Mortgage Total	
	#	%	#	%	#	%	#	%
<i>American Indian/ Alaska Native</i>	1	0.5	0	0.0	733	0.1	1	0.2
<i>Asian</i>	3	1.6	7	1.8	20,079	4.1	10	1.7
<i>Black/ African American</i>	3	1.6	1	0.3	10,044	2.0	4	0.7
<i>Hawaiian/Pac Isl.</i>	0	0.0	0	0.0	556	0.1	0	0.0
<i>2 or more Minority</i>	0	0.0	0	0.0	230	0.1	0	0.0
<i>Joint Race (White/Minority)</i>	1	0.5	0	0.0	5,018	1.0	1	0.2
Total Minority	8	4.2	8	2.1	36,660	7.4	16	2.8
<i>White</i>	98	53.0	101	26.5	343,779	69.8	199	35.2
<i>Race Not Available</i>	79	42.8	272	71.4	112,228	22.8	351	62.0
Total	185	100.0	381	100.0	492,667	100.0	566	100.0
ETHNICITY								
<i>Hispanic or Latino</i>	0	0.0	4	1.0	11,453	2.3	4	0.7
<i>Not Hispanic or Latino</i>	124	67.0	185	48.6	364,065	73.9	309	54.6
<i>Joint (Hisp/Lat /Not Hisp/Lat)</i>	0	0.0	1	0.3	3,683	0.8	1	0.2
<i>Ethnicity Not Available</i>	61	33.0	191	50.1	113,466	23.0	252	44.5
Total	185	100.0	381	100.0	492,667	100.0	566	100.0

Source: 2000 U.S. Census Data

V. *Loss of Affordable Housing*

This review concentrated on the suitability and sustainability of mortgage loans originated by Superior Mortgage by taking into account delinquency and default rates of the mortgage lender and those of the overall marketplace. Information provided by the lender was reviewed as were statistics available on delinquency and default rates for mortgage loans. Additionally, individual mortgage loans were tracked for their status through local Registries of Deeds and other available sources including public records of foreclosure filings.

An extensive review of information and documentation, from both internal and external sources as partially described above, did not reveal lending practices or products that showed an undue concentration or a systematic pattern of lending, including a pattern of early payment defaults, resulting in the loss of affordable housing units. Further, delinquency rates were found to be consistent with industry averages.

SERVICE TEST

The service test evaluates a mortgage lender's record of helping to meet the mortgage credit needs in the Commonwealth by analyzing both the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products; the extent and innovativeness of its community development services; and loss mitigation services to modify loans or otherwise keep delinquent home loan borrowers in their homes. Community development services must benefit the Commonwealth or a broader regional area that includes the Commonwealth.

Superior Mortgage's Service Test performance was determined to be "Needs to Improve" at this time.

Mortgage Lending Services

Superior Mortgage provides mortgage lenders services that are accessible to geographies and individuals of different income levels in the Commonwealth. Customers can apply to Superior Mortgage over the telephone and via the company's website and at the lender's only licensed branch office, 30 Church Street in Belmont, Massachusetts, a middle-income geography.

In 2008, Superior Mortgage closed three offices in the Commonwealth located in Fitchburg, Holliston, and Peabody, which primarily were closed due to low loan volume production. All three offices were situated in middle-income geographies.

Business development relies primarily on referrals, repeat customers and limited print advertisements. The marketing department, situated in the main headquarters in Hammonton, New Jersey, is responsible for generating all marketing and advertising materials for Superior Mortgage. Marketing materials are designed to attract all the Commonwealth's residents. The Belmont branch office has advertising materials made specific to their office and provides them to existing customers of Superior Mortgage and makes them available in the branch office to new applicants.

As Superior Mortgage does not routinely service mortgage loans, it would not work directly with delinquent borrowers. Therefore, this review would not include an evaluation of loan mitigation and modification efforts as the mortgage lender would not be accountable for such action. However, as described above, lending practices and products did not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable.

Community Development Services

A community development service is a service that:

- (a) has as its primary purpose community development; and
- (b) is related to the provision of financial services, including technical services

The Commissioner evaluates community development services pursuant to the following criteria:

- (a) the extent to which the mortgage lender provides community development services; and
- (b) the innovativeness and responsiveness of community development services.

Superior Mortgage provides a minimal number of community development services to meet the mortgage credit needs of the Commonwealth. The Belmont branch manager discussed Superior Mortgage's community involvement at the branch level. In 2009, Superior Mortgage was involved in

hosting a first time homebuyer seminar which was located in Waltham, MA. Several local realtors and attorneys spoke at the seminar as well as staff from the Belmont branch office. The seminar generated business for Superior Mortgage. Individuals who attended the seminar ended up applying for financing at Superior Mortgage.

The Division recognizes that this examination is the mortgage lender's first evaluation of this test; however, records should be maintained going forward to provide credit under this performance test.

Additional focus and commitment by Superior Mortgage should be employed by taking a strong leadership role in other community development activities. Other activities may include, but not be limited to: financial literacy education initiatives targeted to low- and moderate-income individuals; and foreclosure prevention counseling and/or technical assistance to community organizations implementing such programs.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 255E, Section 8, and 209 CMR 54.00, the Mortgage Lender Community Investment (MLCI) regulation, requires all mortgage lenders to take the following actions within 30 business days of receipt of the MLCI evaluation of their mortgage lender:

- 1) Make its most current MLCI performance evaluation available to the public.
- 2) Provide a copy of its current evaluation to the public, upon request. The mortgage lender is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the mortgage lender's evaluation, as prepared by the Division of Banks, may not be altered or abridged in any manner. The mortgage lender is encouraged to include its response to the evaluation in its MLCI public file.

The Division of Banks will publish the mortgage lender's Public Disclosure on its website no sooner than 30 days after the issuance of the Public Disclosure.